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July 8, 1997

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Attention: Policy and Rules Division
Stop Code 1800D

Re: MM Docket Nos. 91-221, 87-8, 94-150, 92-51, and 87-154
Television Station WTWS(TV), New London, Connecticut

Dear Sir or Madam:

On behalf of Roberts Broadcasting of Hartford, L.L.C., licensee of Television Station WTWS(TV), New London, Connecticut, we submit herewith an original and four copies of the licensee's response to the FCC's June 17, 1997 *Public Notice* in the above-captioned proceedings. This submission concerns a Time Brokerage Agreement between Paxson Communications of New London-26, Inc. and Roberts Broadcasting of Hartford, L.L.C., the licensee of Television Station WTWS(TV), New London, Connecticut.

Should any questions arise concerning this matter, kindly contact the undersigned.

Very truly yours,

John R. Feore, Jr.

JRF/lkr
Enclosure

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List ABCDE

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LMA REPLY FORM

MARKET: HARTFORD AND NEW HAVEN, CONNECTICUT

DMA # 27

					Degree of Overlap (%)	Nielsen (all day) Audience Share (9am - midnight)
	Channel No. & <u>Call Sign</u>	Network <u>Affiliation</u>	Licensed <u>Community</u>	Owner/ <u>Licensee</u>	City Grade Grade <u>Grade</u> A B	<u>11/96</u> <u>2/97</u> <u>5/97</u>
Brokered Station:	Channel 26 WTWS(TV)	Independent	New London, CT	Roberts Broadcasting of Hartford, L.L.C.		Not Available
Brokering Station:	None*	N/A	N/A	Paxson Comm- unications of New London-26, Inc.	N/A	

* Affiliates of Paxson Communications of New London -26, Inc. are the licensees of Television Stations WHAI-TV, Channel 43, Bridgeport, Connecticut, and WOST, Block Island, Rhode Island, which overlap the signal contours of WTWS(TV). WHAI-TV and WOST(TV) are independent stations. (Engineering Supplement to be provided).

LMA Specifics:	Date of LMA <u>Signing</u>	Length of <u>Initial Term</u>	Initial Term <u>Start Date</u>	Initial Term <u>End Date</u>	<u>Renewal Provisions/Terms</u> Describe renewal provisions including: (1) length of renewal, (2) at which party's option, (3) whether renewal is automatic, and (4) how renewal option may be exercised.	% Time Brokered <u>per week</u>
	2/12/97	5years	2/12/97	2/12/02	(1) 5 years (2) upon notice by either Licensee or programmer to other party.	up to 96.4% (162 hours/ week)

PUBLIC INTEREST BENEFITS RESULTING FROM ENTERING INTO THE LMA

The Time Brokerage Agreement for WTWS(TV), New London, Connecticut was entered into in conjunction with the sale of the station to Roberts Broadcasting of Hartford, L.L.C. Paxson Communications of New London-26, Inc. financed the purchase of the station by Roberts Broadcasting and, simultaneously, entered into the LMA. Without the LMA, Paxson Communications of New London-26, Inc. would not have been willing to provide the funding to permit Roberts Broadcasting of Hartford, L.L.C., a company wholly-owned by African-Americans, to acquire this station. The LMA provides the funding to permit Roberts Broadcasting to profitably operate this station including the coverage of its debt service.